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November 20, 2020

The Honorable Claire C. Cecchi
United States District Judge
Martin Luther King Jr. Federal Building and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *United States v. Matthew Goettsche, et al.*,
Crim. No. 19-877

Your Honor:

Pursuant to the Government's request on October 21, 2020, the Court granted an extension for the Government to produce the remaining "non-filtered records that were produced by Apple in response to search warrants that presented technical difficulties" (the "Apple Records") by November 21, 2020. The Government continues to experience technical difficulties processing the remaining data within this category and is now using a third-party vendor to address these technical issues. Defense counsel has agreed to a 14-day extension for the Government to produce the remaining data. The Government is accordingly requesting that the deadline to produce the entirety of the Apple Records be extended to December 4, 2020. If the Government is unable to process the remaining data by that date, it will inform defense counsel and the Court accordingly.

Respectfully submitted,

CRAIG CARPENITO
United States Attorney

By: Anthony P. Torntore
Jamie L. Hoxie
Assistant U.S. Attorneys

SO ORDERED

s/Claire C. Cecchi
Claire C. Cecchi, U.S.D.J.

Date: 11/24/2020